



Oregon Coastal Caucus

Sen. Betsy Johnson, Chair
Rep. Caddy McKeown, Vice Chair
Sen. Arnie Roblan
Rep. Deborah Boone
Rep. David Gomberg
Rep. David Brock Smith

Oregon Legislative Coastal Caucus Members:

Senator Betsy Johnson

Coastal Caucus Chair,
Senate, District 16

Representative Caddy McKeown

Coastal Caucus Vice
Chair, House District
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Senator Arnie Roblan

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Representative Deborah Boone

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Representative David Gomberg

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Subject: 900-J Seafood Processing General Wastewater Permit Revision Process

Public Comment Review Staff:
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April 9,

As representatives of Oregon's coastal residents, the Coastal Caucus has followed with interest, and growing concern, Department of Environmental Quality's (DEQ) process to update the 900-J NPDES (National Pollutant Discharge Elimination System) Seafood Processing General Wastewater Permit.

Early in the DEQ process, Coastal Caucus echoed concerns of local seafood processors and urged DEQ to engage processors and industry professionals to help identify pollutant issues as well as environmental and economic impacts directly related to wastewater processing. While DEQ did assure Coastal Caucus that individual visits were made to processors, we continued to hear from our constituents that, rather than engaging local industry for input, DEQ chose instead to solicit comments on new regulatory standards and protocols only once they were already developed through internal DEQ analysis. When industry comments were received, few, if any, made it into the newly proposed standards.

DEQ maintains the need for these stringent new standards in order to comply with Environmental Protection Agency standards, despite feedback that the new regulations exceed EPA requirements. These extreme protocols would potentially subject processors to fines and liability for violations. DEQ offers no recommendation of workable solutions for current processors to be able to comply with requirements under the new general permit. This lack of certainty fosters a regulatory environment that we fear will put Oregon's seafood industry at a competitive disadvantage with both domestic and international markets, most directly with neighboring states Washington and California who also have robust pacific coast seafood processing industries.

Upgrades to make compliance possible with these new protocols is estimated to be as high as \$2 million to \$5 million *per* seafood processing plant. In a region that continues to struggle economically, these constraints will likely result in plant closures, job losses, and additional revenue reductions for coastal counties and cities. DEQ has yet to perform an economic analysis to define the effects of new regulatory standards and protocols. Coastal Caucus feels strongly that the permit revision should not move forward without this analysis.

The DEQ 900J General Permit revision proposes what appear to be major changes in permit standards. While the Coastal Caucus looks to DEQ to maintain high standards of water quality across the state and comply with



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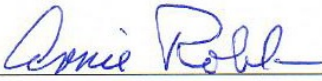
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Clean Water Act requirements and Environmental Protection Agency directives, it is imperative that DEQ work collaboratively with those entities it regulates. In Oregon, seafood processing is a key component of coastal economies and we ask that the State revisit the revision process for the 900-J permit in a way that supports the success of this critical industry.

Sincerely,

Members of the Oregon Coastal Caucus


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